

Walton County, Georgia, a program that covered an event or problem peculiar to Monroe or Walton County, Georgia (Id., Jt. Ex. 5, p. 1), or scheduling a Public Service Announcement ("PSA") specifically responsive to a problem or need peculiar to the WHSG-TV service area (Jt. Ex. 6, p. 1). Nor does Ms. Connolly recall a program during which she scheduled a guest or host from Monroe or Walton County, Georgia (Id.). She was, however, certain that the problems ascertained for the WHSG-TV service area were included on her grids of problems and that guests were scheduled on TBN programming to respond to the problem and needs of the WHSG-TV service area (TBN Ex. 32, p. 5).

33. Ms. Connolly used both the lists of problems from each station and the oral reports and suggestions from the Public Affairs Department as the basis of her research and to schedule guests for particular shows (Id.). Guests were booked to discuss or treat a particular problem on the lists of problems from the various stations (Id.). Usually there was a great deal of agreement, or overlap, concerning the most important problems in the various communities (Id.). If, as was usually the case, the topic on which a guest was to be interviewed was both a problem local to the KTBN, Santa Ana, California service area and a problem in a number of communities served by other TBN stations, guests were requested to discuss the problems from both a local and a national viewpoint (TBN Ex. 33, p. 4). For example, if a guest were discussing the Neighborhood Watch Program, Ms. Connolly would ask the guest (as well as the host) to be sure to discuss how viewers could get in touch with the program in their community, or how to start the program in their community (Id.). In this way the

guest's interview would be responsive to both the crime problem in the local service area as well as in other communities, like the Atlanta Television Market, in which the network program aired (Id.).

34. During each quarter the first priority in scheduling guests would be to treat, more or less equally, the top five problems identified by all of the TBN network stations. These top five problems were pretty much treated equally (Id.). Guests would then be scheduled to treat the other problems mentioned on the lists for each station (Id.). Each quarter Ms. Connolly ensured that a guest was scheduled to discuss every problem on the list of problems for each TBN network station (Id.), and she kept a chart or graph of the problems identified by each community, and of each show produced which treated one of the problems to ensure that each problem was treated thoroughly during the quarter (TBN Ex. 33, pp. 4-5).

35. During the License Term Ms. Connolly met periodically with three or four people in the production department who were writing continuity for TBN produced programming to inform them of the issues which were most important in each community (TBN Ex. 33, p. 2). A list of problems for each community would be posted in the Director's Booth where the continuity people did their job (Id.). Except for The 700 Club the TBN staff did no continuity for programs which weren't produced by TBN or produced in California (Id.). Accordingly, during the License Term no continuity

was taken on programs such as Rev. Stanley's In Touch program or Bishop Earl Paulk's program which were produced in the WHSG-TV service area (Id.).^{7/}

36. Ms. Connolly testified that she was always informed when a new station went on the air, and that she was aware when WHSG-TV went on the air because she knew that the Station had no local studio and was not producing any local programming (TBN Ex. 33, p. 6). Ms. Connolly was, therefore, conscientious about scheduling guests to meet the WHSG-TV service area problems because she knew that the Station had to rely solely on TBN network programming to respond to the service area needs (Id.).

37. Among the network programs for which Ms. Connolly booked guests was the program Joy, which during most of the License Term was a half-hour long interview show hosted by Rev. Jim McClellan (TBN Ex. 33, p. 6; Jt. Ex. 6, p. 1). Since the purpose of Joy was to deal with community problems, the topics discussed and the guests were always chosen with reference to the lists of community problems, including those from WHSG-TV's service area (TBN Ex. 32, p. 6). Ms. Connolly had no recollection of a specific instance in which a guest was booked to respond to a specific problem identified by the WHSG-TV service area, but she was certain she did (Id.). Since the program was produced in Southern California Joy tended to treat the problems identified within KTBN's local area first, but during the taping sessions problems identified by all communities would be treated, even if a particular problem was not pertinent to Southern California (TBN Ex. 33, p. 7). If a particular problem

^{7/}. These two programs, while religious in nature, had substantial public interest content. See TBN Ex. 33, p. 2.

was identified by a number of communities as well as Southern California the guest would be asked to discuss the problem's local and national ramifications (TBN Ex. 33, p. 7). For example, a guest discussing Southern California's traffic problems would be encouraged to comment on the problem from a national viewpoint, such as how other communities could learn from Orange County's problems (Id.).

38. Ms. Connolly booked guests during the license term for the program A Date With Dale, an interview show featuring Dale Evans Rogers (Id.). Since the emphasis of the show was more on entertainment personalities who were known to Mrs. Rogers, the guests weren't always booked based on their ability to discuss a problem on the problems lists, as was the case with Joy (Id.). Treating problems was always a concern of TBN, however, and Ms. Connolly did refer to the lists of problems, where pertinent (TBN Ex. 33, pp. 7-8). A guest who could discuss one of the problems on the problems lists would always be preferred to one who could not (Id.).

39. During the License Term TBN produced a program called Back on Course which dealt with family issues such as divorce, family finance, spouse abuse, alcoholism, etc. (TBN Ex. 33, p. 8). Ms. Connolly was involved both in researching suitable topics for the program and scheduling guests, and in each instance she relied on the lists of problems and needs compiled by the stations like WHSG-TV (Id.).

40. During WHSG-TV's License Term Ms. Connolly requested the host of Doctor and the Word to discuss a specific issue or topic based on the lists of problems for each station, including the WHSG-TV service area (TBN Ex. 34, p. 8). TBN also produced a program called Calling Doctor Whitaker which dealt primarily with health

issues, such as nutrition, aging, the health problems of senior citizens and youth, drug and alcohol abuse, and pollution as it relates to a person's health (Id.). On occasion Dr. Whitaker was asked to discuss or cover a particular topic or issue because that topic or issue was included on the lists of problems identified by the communities served by the TBN network, like WHSG-TV's service area (Id.).

41. TBN's Connolly also reviewed and approved topics for discussion and guests on The Treasures Out of Darkness program, hosted by Sonny and Julie Arguinzoni (Id.). Although she did not book guests for this show, she generally received and reviewed a list of proposed topics to be discussed and guests prior to production, and scrutinized both the guests and topics to determine if they would be responsive to the problems identified by all or some of the stations (Id.).

42. The producers of A Call To Action, a public affairs program dealing with contemporary legal issues, also sent Ms. Connolly's office lists of topics and guests for her approval (Id.). The producers of the show lived in Atlanta (TBN Ex. 33, p. 8), even if the show wasn't produced there (Jt. Ex. 6, p. 1). Ms. Connolly reviewed this information to determine if the show contemplated was responsive to one or more of the problems identified by the stations, and referred the list to Dr. and Mrs. Crouch for their approval (Id.). At times, Mrs. Connolly scheduled guests for the program, and when she did she booked guests based on the lists of problems identified by WHSG-TV's service area (Id.).

43. Ms. Connolly also approved network PSA's and identified the time blocks or programming blocks in which the PSA's could most appropriately be broadcast (TBN

Ex. 33, p. 9). For example, PSA's that dealt with children's issues, or child safety issues, were broadcast during times when the network was broadcasting children's programming (TBN Ex. 33, pp. 9-10). PSA's inserted in network programming were chosen to match the problems identified by the communities each quarter, and, on occasion scheduled PSA's to respond to problems that experience had shown would come up in the next quarter (TBN Ex. 33, p. 10). On occasion, certain PSA's would be scheduled to air with greater frequency in response to a particular program identified in the service area (Id.).

(a) Programming Broadcast Responsive to Community Needs

44. During the License Term WHSG-TV did not broadcast any local programming noted on the Station's logs as "news" (TBN Ex. 32, p. 9). In WHSG-TV's Television Market, the Atlanta Television Market, a number of stations broadcast a greater or lesser amount of local and national news, including: WAGA-TV, channel 5; WATL, channel 36; WGNX, channel 46; WSB, channel 2; WTBS, channel 17; WCEU-TV, channel 69; and, WXIA-TV, channel 11 (Id.). Nor did the Station broadcast editorials (Id.). No programming noted on the logs as "political" was broadcast during the License Term, and no political candidate requested an opportunity to buy spots or time on WHSG-TV during the License Term (Id.). Although TBN purchased the land and was in the process of planning and building a studio, a studio suitable for local production was not completed during the License Term (Id.). A rudimentary studio capable of providing broadcast and emergency transmissions was available, but TBN produced no local programs or PSA's during the License Term (Id.).

(b) Children's Programming

45. During the License Term WHSG-TV broadcast a significant amount of age-specific children's programming designed to satisfy the educational and informational needs of children from preschoolers to teenagers (TBN Ex. 32, p. 10). A review of Mr. Jackson's testimony shows that at no time during the License Term did TBN broadcast less than seven hours per week (including rebroadcasts) of children's programming (Joy Junction; Davey and Goliath; Gospel Bill; John Jacobs and the Power Team; Circle Square; Superbook; Flying House; Quigley's Village; Filling Station; Real Videos; Meadowlark Lemon; Dallas Holm; and, Why Wait? (TBN Ex. 32, pp. 10-16), five hours of which were broadcast on Saturday mornings between 9:00 a.m. and 2:00 p.m. when children were likely to be watching (Joy Junction, Davey and Goliath, Gospel Bill, Superbook, Quigley's Village, Filling Station, Real Videos, John Jacobs, Circle Square, and Flying House) (TBN Ex. 32, pp. 16-21). WHSG-TV's Station Manager, Scott Jackson, is a paid Children's Minister for his church and has been involved in children's ministry for 15 years at churches in North Carolina and Georgia, and has both attended and given workshops and seminars on both the secular and religious educational needs of children (TBN Ex. 32, p. 10). Mr. Jackson, therefore, had some familiarity with the educational and informational needs of children (Id.)

46. WHSG-TV's children's programming was not only age specific, at least two programs broadcast were designed to be responsive to each developmental age group among children, including: preschoolers and early school age (Davey and Goliath,

Superbook, Filling Station, Flying House, Quigley Village); middle school (Joy Junction and Gospel Bill), and preteens and teenagers (Real Videos, John Jacobs and the Power Team, Dallas Holm, Meadowlark Lemon, Why Wait?, and Circle Square) (TBN Ex. 32, pp. 10-16). Preschoolers had no less than two hours per week and four programs specifically designed to meet their needs, and teenagers were served with programs totalling three hours per week (Id.). Moreover, throughout the License Term WHSG-TV's Quarterly Reports included an Addendum which described the children's programming broadcast by the Station (See, e.g., TBN Ex. 32, pp. 28-29). Children's programming broadcast on WHSG-TV contained no commercial spots or commercial spot announcements (TBN Ex. 32, pp. 15-16). One non-Trinity produced children's program, Quigley's Village, contained commercial spots, but during the License Term TBN's Programming Department "sanitized" the program by covering over the commercial spot announcements with public service announcements of program promotions (TBN Ex. 32, p. 15).

47. Joy Junction was a non-TBN produced children's program designed to appeal to six- to twelve-year-olds and broadcast between 10 and 10:30 a.m. on Saturday mornings throughout the entire License Term (Id.). This show featured a western theme with the host being a Sheriff, and a studio audience of children aged six to twelve years old (Id.). The show featured skits, the Sheriff interacting with the children in the studio audience, music, competitions between the boys and the girls using scripture, and a regular guest who did drawing and art work with the children (Id.). The Sheriff presented a theme or moral lesson that ran through each program, usually based on a

scripture verse (Id.). These morals might be to work out problems by cooperating and not fighting; respect for your parents and elders; to work hard to do well in school; respecting other people's property; and others (Id.). The children were taught language arts skills, memorization techniques, art, music, and lessons about interpersonal skills (TBN Ex. 32, p. 11).

48. Davey and Goliath was a half-hour program aimed at the two- through eight-year-old age group produced by the Lutheran Church that ran between 9:00 a.m. to 9:30 a.m. every Saturday morning during the entire License Term (Id.). The show was a claymation show, focussing on the adventures of Davey and his dog, Goliath (Id.). Their adventures would always involve a moral lesson about good behavior or citizenship, encouraging children to tell the truth, deal with their problems nonviolently, to help their mom and dad, to obey their parents, and exhorting the children to be kind to one another (Id.). The children learned about literature, art, and were taught listening skills and interpersonal and social skills (Id.).

49. The Gospel Bill Show was a half-hour program produced by the Willie George Ministries aimed at the six- to twelve-year-old age group broadcast throughout the License Term on Saturdays between 9:30 and 10:00 a.m. (TBN Ex. 32, p. 12). The show had a western theme with the sheriff interacting with different townsfolk such as the deputy, a storekeeper, and a bad guy (Id.). Ken Blount, a country and western singer, was the deputy and was featured in music video segments of the show (Id.). During each show the Sheriff and other characters imparted a moral lesson based on scripture, such as telling the truth, how to be a friend, or the importance of obeying

your parents, as the main theme (Id.). The show also featured a filmed segment called "At the Zoo," where the host talked about an animal that the children would find at the zoo (Id.). The children learned about science (zoology) and practiced listening skills (Id.).

50. John Jacobs and the Power Team is a half-hour TBN produced program broadcast on Saturdays at 1:00 to 1:30 p.m. or 1:30 to 2:00 p.m. throughout the entire License Term, and featured strong man John Jacobs and his friends doing exhibitions of strength, such as breaking handcuffs. The program is designed to appeal to teens and pre-teens (TBN Ex. 32, p. 13). Interspersed with their feats of strength the Power Team would talk about teen oriented issues such as: peer pressure; premarital sex; teen suicide; how to succeed in school; the dangers of drugs and alcohol; and, how to cope with the parent-teen relationship (Id.). The homilies discussed moral lessons and the program was designed to appeal to preteens and teenagers (Id.).

51. Circle Square was a half-hour non-TBN produced program broadcast throughout the License Term on Saturdays at 10:30 a.m. (Id.). This program was hosted by teenagers featuring music, skits and travel segments (Id.). The children on the show participated in skits based on real life situations stressing the appropriate way to deal with real life situations (Id.). Issues such as living together peacefully and respecting other customs were stressed (Id.). An important part of the program was the feature where the hosts took a camera to different locations, and where the differences in culture and language would be discussed (Id.). The program would cover, at various times, topics relating to physical and cultural geography, literature, drama, and taught

interpersonal skills and coping mechanisms (Id.). This show was directed to appeal to the 10- to 16-year-old age group (Id.).

52. Flying House was a half-hour program produced by the Christian Broadcasting Network which was broadcast Saturday afternoon (12:00 p.m. to 12:30 p.m.) (TBN Ex. 32, p. 14-15). Flying House was an animated feature designed to appeal to four- to eight-year-olds where a professor could take his house back in time to old testament or new testament times (Id.). The children accompanying the professor would become eyewitnesses to events depicted in the scripture, and learn about biblical geography and culture (Id.). The program taught about subjects such as the Ten Commandments and emphasized the moral lesson behind each story (Id.). Each program would include lessons in cultural and physical geography, and literature (Id.).

53. Quigley's Village was a half-hour program broadcast at 11:30 a.m. on Saturdays and designed to appeal to four-to ten-year-old age group (TBN Ex. 32, p. 15). Quigley is a Robot who interacts with a village of puppet people (Id.). The show featured music and songs, and taught the children moral lessons such as learning to share, to cooperate with one another, and to respect their parents (Id.). Shows would include lessons in language arts (stories) and taught children listening skills (Id.).

54. The Filling Station was a half-hour non-TBN produced program which was broadcast between 11:00 and 11:30 a.m. on Saturdays during the License Term (TBN Ex. 32, p. 16). The program was an animated variety show for younger children in the two- to eight-year-old age group (TBN Ex. 32, p. 16). The show featured "Busy Bees" who taught lessons on appropriate behavior, such as obeying your parents (Id.).

55. Real Videos was a half-hour TBN produced program designed to appeal to pre-teens and teenagers that was broadcast throughout the License Term at 1:00 p.m. on Saturday afternoons or at 1:00 a.m. on Sunday mornings (TBN Ex. 32, p. 11). Real Videos was a music video show featuring wholesome music videos and travel to different program venues, such as the Long Beach Grand Prix, Knott's Berry Farm, or a Rodeo (TBN Ex. 32, pp. 11-12). The host would encourage his audience to be themselves and resist peer pressure, and always do their best, particularly in school (Id.). Lessons in physical and cultural geography and the language of the place where the program was being filmed were of staple of each show (TBN Ex. 32, p. 12).

56. Dallas Holm was a TBN produced half-hour program broadcast at various times on Sunday mornings, usually in the early hours (4:00 to 4:30 a.m.) during the License Term (Id.). The program featured contemporary Christian videos and was designed to appeal to teenagers (12- to 18-year-olds) (TBN Ex. 32, p. 14).

57. Meadowlark Lemon is a TBN produced half-hour program broadcast at 7:00 a.m. on Friday mornings and 4:00 a.m. on Saturday mornings throughout the License Term (Id.). The show featured Harlem Globetrotter great Meadowlark Lemon interviewing different professional athletes, such as Rosey Grier and Tom Landry, or other celebrities (Id.). The interviews would stress how the interviewee dealt with the temptations of drug and alcohol abuse in professional sports, or how to deal with problems in their lives (Id.). The show was designed to appeal to teenagers (12- to 18-year-olds).

58. Superbook was a half-hour program produced by the Christian Broadcasting Network which was broadcast on Saturday mornings at 8:30 a.m. and Saturday afternoons at 12:30 p.m. during the License Term (Id.). The show was an animated variety program which featured Bible stories emphasizing the moral lesson of the Bible story (Id.). Lessons included the proper way to interact with other children, centering on themes such as "be kind to one another." (Id.). The program was aimed at the four- to eight-year-old audience (Id.).

59. Why Wait? was a program hosted by Josh McDowell designed to appeal primarily to teenagers (TBN Ex. 32, p. 16). The program included teen guests discussing teen issues such as: peer pressure; premarital sex; teen suicide; AIDS; drug and alcohol abuse; and, how to get along with your parents (Id.). On occasion the show would have guests from the sports or music fields familiar to teens who would answer questions from guests (Id.).

(c) Other Programming

60. WHSG-TV also broadcast other programming responsive to the problems and needs of its service area, as reported in the Quarterly Reports (Id.).

61. Feedback is a half-hour panel show with a host moderating a discussion of issues of importance in the community which was broadcast on the network at different times during the License Term, usually at 11:30 a.m. with two rebroadcasts on Wednesdays at 5:00 a.m. and Saturdays at 8:30 a.m. weekly during the License Term (TBN Ex. 32, p. 17). Although Feedback was produced in Miami and the guests checked by Ms. Connolly to determine if the program was responsive to the problems

and needs in Miami (Jt. Ex. 6, p. 1), the program covered topics in a manner that was responsive to the problems and needs of WHSG-TV's service area as well (TBN Ex. 32, p. 18). During the License Term an African-American, Harold Ray, was the program host, and the discussions covered virtually every one of the problems and needs identified within the WHSG-TV service area, including: pollution and the environment (TBN Ex. 32, Tab B, p. 19); health (TBN ex. 32, Tab B, p. 69) crime (TBN Ex. 32, Tab B, p. 16); alcohol and drug addiction and abuse (TBN Ex. 32, Tab B, p. 101); education and schools (TBN Ex. 32, Tab B, p. 41); and, homelessness (TBN Ex. 32, Tab B, p. 75).

62. An example of a Feedback program noted in the Station's Quarterly Reports and treating the problem of homelessness was broadcast on August 15, 1991 at 11:30 a.m. and featured Steve Michaels of the Florida Food Recovery Project and Christian Hildner of the Miami Coalition for the Homeless discussing the problems afflicting the homeless, the economic and other factors which contribute to homelessness, and the problems of homeless families and homeless families headed by a single mother (TBN Ex. 32, Tab B, p. 75). The amount of food that is normally thrown away and ways to provide food to the community's homeless were also discussed (Id.).

63. One Trinity program, Joy, was a half-hour program hosted by Jim McClellan which was broadcast daily, Monday through Friday, at 9:30 a.m. throughout the entire License Term (TBN Ex. 32, p. 16). Joy included interviews with one or perhaps two guests per program discussing community problems and needs (Id.). Moreover, even though the program was produced in Southern California, the host made a point of discussing the issue with his guest from both a national and local

perspective (TBN Ex. 32, p. 16-17). For example, discussions of alcohol and drug addiction would include information on where a viewer might go in his or her community to find out where help was available (TBN Ex. 32, p. 17). Moreover, since Joy was a network show, the producers of the show had the benefit of reviewing WHSG-TV's service area lists of problems and issues in choosing the topics to discuss and guests to treat them (Id.). The problems of: health (TBN Ex. 32, Tab B, p. 42); alcohol and drug addiction (TBN Ex. 32, Tab B, p. 25-26); crime (TBN Ex. 32, Tab B, p. 12); education and schools (TBN Ex. 32, Tab B, p. 40); homelessness (TBN Ex. 32, Tab B, p. 75); and, traffic and transportation (TBN Ex. 32, Tab B, p. 52)--all identified as problems and issues of concern to WHSG-TV service area residents--were all explored and treated on a regular basis on Joy (Id.).

64. An example of a Joy program responsive to a problem identified in the WHSG-TV service area--that of traffic and transportation--was the program broadcast on September 9, 1991 at 9:30 a.m., when Mr. McClellan discussed ways to reduce stress when driving freeways, including "good freeway manners," with Dr. David Rizzo (TBN Ex. 32, Tab B, p. 52).

65. The network Praise the Lord show also treated local needs through its interviews and discussions of issues of concern to the residents of WHSG-TV's service area (TBN Ex. 32, p. 18). At least twice during the License Term the PTL program featured a guest from the service area, including singer musician Dottie Rambo and Bishop Earl Paulk (Id.). PTL regularly featured discussions of the problems of health

care (TBN Ex. 32, Tab B, p. 91) and alcohol and drug abuse (TBN Ex. 32, Tab B, p. 101).

66. Other network shows that regularly treated problems and issues of importance to the WHSG-TV service area, as shown in the Station's Quarterly Reports, included: Calling Dr. Whitaker, broadcast once weekly at either 11:30 a.m. or 2:00 p.m. during the License Term which often discussed health problems such as the effect of a person's lifestyle and mental outlook on health, and the ramifications of alcohol and drug abuse (TBN Ex. 32, p. 13). Dr. Whitaker discussed issues like good nutrition, "yo-yo" dieting, and others (Id.). During the License Term the program regular treated health and health care issues (TBN Ex. 32, Tab B, p. 42; TBN Ex. 32, Tab B, p. 44). An example of a calling Dr. Whitaker program broadcast during the License Term was an episode broadcast on September 3, 1991 at 11:30 a.m. where a noted Immune Toxicologist was a guest on the show and discussed a number of issues, such as: hysterectomy surgery and weight gain; female hormones and fungus problems; and, "yo-yo" dieting and balanced nutrition (TBN Ex. 32, Tab B, p. 42).

67. A Call to Action, a show about contemporary legal issues discussed problems and issues such as education and schools (TBN Ex. 32, Tab B, p. 88) and health (TBN Ex. 32, Tab B, p. 47). An example of such a program was the Call To Action broadcast on October 14, 1991 at 8:30 p.m., where a panel discussed the complex problems of today's high school students as well as contemporary problems with the educational system (TBN Ex. 32, Tab B, p. 66). The history of the decline of the quality of the public educational system was also discussed (Id.).

68. Treasures Out of Darkness, hosted by Sonny and Julie Arguinzoni, treated issues such as crime (TBN Ex. 32, Tab B, p. 50) and alcohol and drug dependency (TBN Ex. 32, Tab B, p. 101); and, education (TBN Ex. 32, Tab B, p. 17). An example of a program treating drug and alcohol addiction is the Treasures Out of Darkness broadcast on June 1, 1991 at both 2:00 and 5:30 a.m. The program featured an interview of 21 minutes in length with a young woman who had grown up in a broken home where alcohol was abused (TBN Ex. 32, Tab B, p. 22). The young woman grew up bitter and the host discussed the factors in her life that led her to follow the family pattern of alcohol abuse (Id.). The woman had a conversion experience and now ministers to others with chemical abuse problems, encouraging viewers who were out of control on drugs or alcohol to seek help for their emotional and spiritual needs in support groups (Id.).

69. The 700 Club, produced by the Christian Broadcasting Network, often included discussion segments treating issues such as: crime (TBN Ex. 32, Tab B, p. 51); drug and alcohol abuse (TBN Ex. 32, Tab B, p. 74); health care (TBN Ex. 32, Tab B, p. 71); and, education and schools (TBN Ex. 32, Tab B, p. 99). An example of an episode of the 700 Club which addressed the issue of health and health care was the episode broadcast on July 2, 1991 at 11:30 a.m., where a guest discussed nutrition and fast foods (TBN Ex. 32, Tab B, p. 48). The expert discussed new changes in the fast food business that increased consumer nutrition choices and analyzed the food offered at specific fast food chains (Id.). Specific good nutritional choices were identified for each fast food chain, and viewers were encouraged to choose low-fat foods and to write to

corporate headquarters to encourage chains to provide better nutrition in their food (Id.).

70. Concerning the issue of health, The Doctor and the Word, hosted by Dr. Reginald Cherry, often provided helpful and current information concerning health issues, such as: aging; nutrition; and pollution's effect on the body, and was responsive to issues such as the environment, health and pollution (TBN Ex. 32, Tab B, p. 43; TBN Ex. 32, Tab B, p. 46; TBN Ex. 32, Tab B, p. 98). An example of a program treating the issue of health was the Doctor and the Word program broadcast on November 25, 1991 at 2:30 p.m., on which Dr. and Mrs. Cherry discussed ways to cut fat in the traditional Thanksgiving dinner, and how to "eat right" during the holidays (TBN Ex. 32, Tab B, p. 69). The Doctor pointed out that a one percent reduction in cholesterol intake reduced the risk of heart disease by two percent.

71. A Date With Dale, a show hosted by Dale Evans, on occasion got into substantive discussions about issues such as drugs and alcohol abuse (TBN Ex. 32, Tab B, p. 23).

72. During the License Term WHSG-TV broadcast a number of programs which were produced in the Station's service area (TBN Ex. 32, p. 19). For example, throughout the License Term The Earl Paulk Show was broadcast at 9:00 a.m. each Sunday morning (TBN Ex. 32, pp. 19-20). Rev. Paulk is the pastor of a large (over 5,000 members) mixed race church in Atlanta, who, throughout the service, mentioned the church's outreach ministries in Atlanta, particularly focussing on the children and teenagers in the Bankhead project of Atlanta and the church built low-income housing

across the street from the church (TBN Ex. 32, p. 20). The church's food ministry and large drug and alcohol addiction ministry was often featured, highlighting members of the congregation who gave testimony concerning how they had been helped to conquer their addiction (Id.). Rev. Paulk also spoke a great deal about race relations in the community, about the ravages of drug and alcohol dependency, and about AIDS, the homeless, low income housing and poverty (Id.). Often the program included interviews with people who were involved in an outreach ministry, and a number would be flashed on the screen during the program so that viewers could call for help from any of the church's many ministries (Id.).

73. Similarly, beginning November 23, 1991 and throughout the License Term the Rev. Charles Stanley broadcast In Touch from his large Atlanta church at 8:00 p.m. every Saturday night (Id.). Reverend Stanley would often address local issues during his preaching, including, during the License Term, the issue of AIDS (Id.).

74. Both In Touch and Bishop Paulk's show were broadcast nationwide on the network. From October 6, 1991 through the end of the License Term, however, one primarily religious program, Changing Your World, produced by the World Changer's Ministry in Atlanta, was seen only within the WHSG-TV service area (TBN Ex. 32, p. 21). The program was broadcast each Sunday morning at 10:30 a.m (Id.). The program was produced by a large and dynamic African-American congregation, and the pastor, Rev. Creflow Dollar, often dealt with local issues such as racism, poverty and fair housing, in his sermons (Id.).

75. In Touch, The Earl Paulk Show, and Changing Your World were all an hour in length (except Changing Your World, which was a half-hour in length), and paid to have their programs broadcast on WHSG-TV or TBN (Jt. Ex. 5, p. 2).

76. Finally, WHSG-TV broadcast a number of PSA's during its programming, all of which were inserted by the Network in Network programming (TBN Ex. 32, p. 21). A review of the Station's Quarterly Reports showed that the PSA's broadcast during network programming are often specifically responsive to the problems and needs ascertained in the WHSG-TV service area (Id.). WHSG-TV seldom ran PSA's of over a minute in length, and the number of PSA's broadcast each week varied (Jt. Ex. 4, p. 1-2). From the beginning of the License Term until roughly the first week of October WHSG seldom aired less than 15 PSA's a week, and often broadcast many more than that. (See, for example, the week of May 26 through June 1, 1991 when WHSG-TV broadcast 35 PSA's.) Following the first week of October, 1991 the number of PSA's seemed to drop, from a high of roughly 21 (week of January 12 to January 18, 1992) to 3 (week of March 22 to March 28, 1992, the last full week of the License Term).^{8/} A review of the PSA's broadcast during the License Term shows that WHSG-TV broadcast PSA's on: health care (TBN Ex. 32, Tab B, p. 80); education and the schools (TBN Ex. 32, Tab B, pp. 32, 59, 80); child abuse (TBN Ex. 32, Tab B, p. 57); conservation and the environment (TBN Ex. 32, Tab B, p. 57; many, many PSA's on drug and alcohol abuse (TBN Ex. 32, Tab B, pp. 31, 58, 79); discrimination (TBN

^{8/}. The weeks of March 31-April 6, 1991 and November 3 to November 9, 1991 show no PSA's broadcast at all. These weeks were TBN telethon weeks when regular programming was suspended.

Ex. 32, Tab B, p. 57); human and family relationships (TBN Ex. 32, Tab B, p. 33); missing children (TBN Ex. 32, Tab B, p. 61); safety (TBN Ex. 32, Tab B, p. 62); senior citizens and the elderly (TBN Ex. 32, Tab B, p. 35); youth and children (TBN Ex. 32, Tab B, p. 62); and, the handicapped (TBN Ex. 32, Tab B, p. 83).

C. The Applicants and Their Media Interests

1) Trinity^{9/}

77. Trinity is a nonprofit/nonstock California corporation. Trinity was incorporated on August 2, 1973, and operates pursuant to its corporate bylaws. Trinity was recognized as a tax-exempt public charity by the Internal Revenue Service on November 30, 1973. Its holdings are irrevocably dedicated for charitable use, not for the private gain of its officers and directors.

78. The officers and directors of Trinity are as follows:

<u>Name</u>	<u>Position</u>
Paul F. Crouch	President/Director
Janice W. Crouch	Vice President/Director
Norman G. Juggert	Secretary-Treasurer/Director
Terrence M. Hickey	Assistant Secretary
Matthew Crouch	Assistant Secretary
Allan Brown	Assistant Secretary
Jane Duff	Assistant Secretary ^{10/}

^{9/} All findings in this Section are from Joint Exhibit 1.

^{10/} As reported in this proceeding in Trinity's June 10, 1994 Informational Notice, effective June 1, 1994 Mrs. Duff was no longer an officer (assistant secretary) of Trinity, or any Trinity related company, viz; Trinity Broadcasting of Florida, Inc.; Trinity Broadcasting of New York, Inc.; Trinity Broadcasting of Oklahoma City, Inc.; Trinity Broadcasting of Washington; Trinity Broadcasting of Arizona, Inc.; Trinity Broadcasting of Indiana, Inc.; and Trinity Broadcasting of Texas, Inc. By Memorandum Opinion and
(continued...)

79. Its assets and holdings, include:

a. Full Power Television and Radio Stations:^{11/}

- (1) KTBN-TV, Santa Ana, California (license acquired August 2, 1974);**
- (2) WDLI(TV), Canton, Ohio (license acquired April 16, 1986);**
- (3) WHSG(TV), Monroe, Georgia (CP Acquired December 28, 1989); and,**
- (4) KGHO(AM/FM), Hoquiam, Washington (License acquired March 29, 1989)**

b. Television Translator Stations:^{12/}

- | | | |
|-------------|-------------------|---|
| (1) | W41BN | Dothan, Alabama |
| (2) | W64DJ | Scottsboro, Alabama |
| (3) | W52BC | Selma, Alabama |
| (4) | K20CZ (CP) | Bullhead City, Arizona |
| (5) | K63DK | Globe, Arizona |
| (6) | K38CX | Shonto/Tonalea, Arizona |
| (7) | K42BS | Fayetteville, Arkansas |
| (8) | K27DI | Fort Smith, Arkansas |
| (9) | K43CJ | Mountain Home, Arkansas |
| (10) | K57FD | Atwater, California |
| (11) | K55CN | Bakersfield, California |
| (12) | K42DT (CP) | Coalinga, California^{13/} |
| (13) | K60BB | Desert Hot Springs, California |
| (14) | K47EH (CP) | Eureka, California^{14/} |
| (15) | K54DN | Lancaster, California |

^{10/}(...continued)

Order, FCC 94M-421 (released June 27, 1994) the Presiding Judge accepted Trinity's Informational Notice for 1.65 purposes, and Trinity sought no comparative credit.

^{11/} TBN is also the licensee of an international short wave radio station, KTBN, Salt Lake City, Utah.

^{12/} Authorizations which have not yet been constructed are denoted with a "CP."

^{13/} Formerly, K53AT, Buellton, California

^{14/} Formerly, K30CC, Alturas, California

(16)	K53DT	Monterey, California
(17)	K66BM	Palm Springs, California
(18)	K15CO	Porterville, California
(19)	K65DJ	Redding, California
(20)	K27EG	Ridgecrest, California
(21)	K69FB	Sacramento, California
(22)	K15DB (CP)	Santa Barbara, California
(23)	K43CA (CP)	Twentynine Palms, California ^{15/}
(24)	K33BT	Victorville, California
(25)	K25DO	Ventura, California
(26)	K33DN	Denver, Colorado
(27)	K47AQ	Denver, Colorado
(28)	K48CG	Loveland, Colorado
(29)	W67BG	Dover, Delaware
(30)	W60BK	Dunedin, Florida
(31)	W67BY	Fort Myers, Florida
(32)	W23AQ	Lake City, Florida
(33)	W58BK (CP)	Naples, Florida
(34)	W19AZ (CP)	Okeechobee, Florida
(35)	W17BO	Sebring, Florida
(36)	W68CF	Tampa, Florida
(37)	W23AC	Albany, Georgia
(38)	W65BI	Augusta, Georgia
(39)	W33AL	Brunswick, Georgia
(40)	W19BP (CP)	Luella, Georgia
(41)	W55BM	Marietta, Georgia
(42)	W67BJ	Savannah, Georgia
(43)	W20BF (CP)	Tifton, Georgia ^{16/}
(44)	W66BW	Valdosta, Georgia
(45)	W46BZ (CP)	Waycross, Georgia
(46)	K47BE	Boise, Idaho
(47)	K16CQ	Twin Falls, Idaho
(48)	K15DG	Pocatello, Idaho
(49)	W34AY	Champaign, Illinois
(50)	W29BG	Decatur, Illinois
(51)	W30AW (CP)	Elgin, Illinois
(52)	W36A0	Palatine, Illinois
(53)	W22AJ	Waukegan, Illinois
(54)	W38BK	Evansville, Indiana

^{15/} Formerly, K43CA, Quartzite, Arizona

^{16/} Formerly W39BJ, Waycross, Georgia

(55)	W36AR	Lafayette, Indiana
(56)	W24AI (CP)	Elkhart, Indiana ^{17/}
(57)	W65BK	Terre Haute, Indiana
(58)	W61FF	Cedar Rapids, Iowa
(59)	K58BX	Davenport, Iowa
(60)	K42AM	Ottumwa, Iowa
(61)	K65BY	Waterloo, Iowa
(62)	K25DS	Junction City, Kansas
(63)	K31BW	Manhattan, Kansas
(64)	K15CN	Salina, Kansas
(65)	K21AP	Topeka, Kansas
(66)	K59DA	Wichita, Kansas
(67)	W41AZ	Corbin, Kentucky
(68)	W62BH	Hopkinsville, Kentucky
(69)	K56DR	Baton Rouge, Louisiana
(70)	K45DI	Mermentau, Louisiana
(71)	K49DE (CP)	New Iberia, Louisiana ^{18/}
(72)	K59DG	New Orleans, Louisiana
(73)	W65CE	Shreveport, Louisiana
(74)	W63BR (CP)	York Center, Maine
(75)	W51AG	Presque Isle, Maine
(76)	W16AE	Cresaptown, Maryland
(77)	W42AU (CP)	Pittsfield, Massachusetts
(78)	W66BV	Detroit, Michigan
(79)	W19BA	Grand Rapids, Michigan
(80)	W29BE	Muskegon, Michigan
(81)	K58CM	Duluth, Minnesota
(82)	K58BS	Minneapolis, Minnesota
(83)	K60DS	Rochester, Minnesota
(84)	K19BG	St. Cloud, Minnesota
(85)	W29BH	Biloxi, Mississippi
(86)	W31AG	Clarksdale, Mississippi
(87)	W25AD	Columbus, Mississippi
(88)	W25BA	Grenada, Mississippi
(89)	W09AU (CP)	Greenville, Mississippi ^{19/}
(90)	W36AC	McComb, Mississippi

^{17/} Formerly W24AI, Michigan City, Indiana

^{18/} Formerly K49DE, Lafayette, Louisiana

^{19/} Formerly W09AU, Laurel, Mississippi

(91)	W63BK (CP)	Meridian, Mississippi ^{20/}
(92)	W58BO	Natchez, Mississippi
(93)	W46AV	Pascagoula, Mississippi
(94)	K56AU	Columbia, Missouri
(95)	K39CP	Poplar Bluff, Missouri
(96)	K49DG (CP)	Springfield, Missouri
(97)	K52DH	Springfield, Missouri
(98)	K34BR	St. Charles, Missouri
(99)	K18BT	St. Louis, Missouri
(100)	K53DW	Great Falls, Montana
(101)	K41CX	Helena, Montana
(102)	K26DD	Kalispell, Montana
(103)	K39AJ	Malcolm, Nebraska
(104)	K26CV	Ogallala, Nebraska
(105)	K19CU	Carson City, Nevada
(106)	K57FA	Las Vegas, Nevada
(107)	K45AV	Reno, Nevada
(108)	W36BJ	Atlantic City, New Jersey
(109)	K18CT	Raton, New Mexico
(110)	W64BH	Albany, New York
(111)	W14AH	Binghamton, New York
(112)	W14AZ	Glen Falls, New York
(113)	W44BG (CP)	Ithaca, New York
(114)	W10BH	Jamestown, New York
(115)	W22AZ	Olean, New York
(116)	W41AE	Utica, New York
(117)	W68BL	Charlotte, North Carolina
(118)	W53BE (CP)	Fayetteville, North Carolina
(119)	W59BA	Goldsboro, North Carolina
(120)	W54BR (CP)	Greenville, North Carolina
(121)	W21BL (CP)	Jacksonville, North Carolina ^{21/}
(122)	W52BM (CP)	Lumberton, North Carolina
(123)	W38BB	Raleigh, North Carolina
(124)	W66BT	Statesville, North Carolina
(125)	W20AL	Wilmington, North Carolina
(126)	K56ET (CP)	Fargo, North Dakota
(127)	K22DQ	Grand Forks, North Dakota
(128)	K40DE	Williston, North Dakota
(129)	W40AE	Chillicothe, Ohio

^{20/} Formerly W63BK, Pensacola, Florida

^{21/} Formerly W54BI, Georgetown, South Carolina